

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OKLAHOMA

W. A. DREW EDMONDSON, in )  
his capacity as ATTORNEY )  
GENERAL OF THE STATE OF )  
OKLAHOMA and OKLAHOMA )  
SECRETARY OF THE )  
ENVIRONMENT C. MILES )  
TOLBERT, in his capacity )  
as the TRUSTEE FOR NATURAL )  
RESOURCES FOR THE STATE OF )  
OKLAHOMA, ) 4:05-CV-00329-TCK-SAJ  
Plaintiffs, )  
vs. )  
TYSON FOODS, INC., et al, )  
Defendants. )  

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DEPOSITION OF  
DONALD DALTON

April 16, 2009

10:00 a.m.

999 Peachtree Street, N.E.  
Atlanta, Georgia

Frances Buono, RPR, CCR-B-791

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Donald Dalton

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1 necessarily, reflect the opinions of the individual  
2 members of the association?

3 A. I would say no, not necessarily. We might  
4 present a position to the board of directors and have  
5 an objection to it from some member --

6 Q. So simply because the U.S. Poultry & Egg  
7 Association takes a position, doesn't mean that the  
8 individual members, necessarily, agree with that  
9 position. Would that be accurate?

10 A. That's correct.

11 Q. To your knowledge, has the -- strike that.  
12 Has the Poultry Water Quality Consortium  
13 ever taken the position that there should be a  
14 complete ban on the use of poultry litter as  
15 fertilizer?

16 A. I don't know the answer to that.

17 Q. It was my understanding from your prior  
18 testimony that this Poultry Water Quality Handbook  
19 was a collection of various materials that existed at  
20 the time that the handbook was put together; is that  
21 correct?

22 A. That's correct.

23 Q. So would you agree that the size  
24 underlying nutrient management and litter application  
25 changes over time?